

**TO: Derek Robinson**

**FROM: Steve Castleman and David Anton on Behalf of Greenaction**

**RE: List of Potential Percipient Witnesses to Tetra Tech's Fraud**

**DATE: January 30, 2018**

**PERCIPIENT WITNESSES WE BELIEVE FEDERAL AUTHORITIES MAY HAVE INTERVIEWED**

If they have not been fully interviewed they should be. Areas that should be explored are noted.

**Christina Dougherty**

The wife of General Manager William "Bill" Dougherty, she was employed by sub-contractor IO Environmental & Infrastructure Inc. She was deeply involved in the data reviews and the writing of reports to the Navy and regulators which were based on fraudulent data. Her involvement in the data and report development should be carefully explored as well as her personal involvement in the filling out of fraudulent COC documents. [We have witnesses who are aware of this activity, and can provide that information to investigators upon their request.]

**William "Bill" Dougherty**

Bill Dougherty was the General Manager of the HPNS project for the later years when the fraud escalated. Witnesses have informed us of numerous times that Dougherty directed that only clean samples come back for final reports on remediation, rather than real samples. These individuals include Anthony Smith, Josh Hooper, Joe Cunningham [when he was assigned to lead a team when Rolfe was out], and Carey Bell. There should be a detailed inquiry into the involvement of Dougherty in assisting in the start-up of IO Environmental & Infrastructure Inc., [Christine Dougherty was the first hire of IOEI, and Thorpe Miller and his wife, Karisa Miller, were hired shortly thereafter] in exchange for IOEI's complicity in rad fraud. An inquiry should also be made into the involvement of Dougherty in assisting in the start-up of RSRS as a corporation and its takeover of Rad Tech services at HPNS in exchange for RSRS's complicity in rad fraud.

**Justin Hubbard**

An HP Supervisor for TTEC, Hubbard directed Rad Techs to engage in false soil samples in trenches and prior building sites. He was personally involved in ordering the changing of scan data on TT computers and made threats to compel employees under his supervision to engage in rad fraud [we can provide lists of individuals so threatened to investigators upon request]. Hubbard was involved in and has knowledge of building scan frauds, including scanning too fast, and not scanning areas at all; instead he instructed that rad techs turn on machines and let them run without scanning, providing false data. He also has knowledge of manipulation of the conveyor belt's speed during the time soil was scanned on a conveyor belt. He was then assigned

to oversee scanning of remaining stockpiled soil after the conveyor belt program was discontinued due to the fraud.

### **Laurie Lowman**

Lowman was the RASO representative over the HPNS rad remediation program. Lowman should be asked about the efforts she took to have her son Thorpe Miller and daughter in law Karisa Miller hired to work at HPNS, including requests to Paul Wall, lab manager, and Bill Dougherty, GM. Inquiry should be done to examine whether Lowman turned a blind eye to the fraud due to being co-opted as a result of the hire of her son and daughter in law. Inquiry should also be made into her approval in mid-2011 to decrease the sensitivity of the Portal Monitor and prohibiting the use of scaffolding to check truck loads that failed the Portal Monitor. She also directed improper scanning at the RSYs.

### **Dennis McWade**

McWade was the Construction Superintendent. He should be questioned about: directing rad falsification, including at Building 351A as reported by Anthony Smith; improperly removing rad-contaminated fencing as reported by Susan Andrews; and threats of termination if rad workers did not go along with rad fraud as reported by Smith and others. He should also be asked about knowledge of his wife's (Jane Taylor's) resume fraud prior to being hired and McWade's ordering New World to re-hire Jane Taylor when she sought to return from Tennessee despite McWade's knowledge of the resume fraud and her lack of knowledge of rad remediation. Inquiry should also be made into directions by McWade to have Taylor oversee fraudulent RSY pad soil processing.

### **Thorpe Miller**

Miller was a TT and then IOEI employee in rad data processing, under the supervision of Christina Dougherty. Inquiry should be made into his hiring despite his lack of experience and his transfer to IOEI to hide a conflict of interest due to Lowman being his mother. He also has knowledge of rad fraud involved in RSY pad processing and towed array results not correlating with lab sample results.

### **Jeffery Rolfe**

Rolfe had personal involvement in taking false samples by avoiding hot spots in trenches, and surface areas, COC fraud and soil-switch fraud. He was directed to engage in fraud by McWade, Dougherty, Stephen Role and Justin Hubbard.

### **Stephen Rolfe**

A Rad Supervisor, Rolfe was personally involved in ordering soil sample switching fraud and chain of custody fraud. He also directed Tina Rolfe, Rick Zahensky and possibly others to alter scanning data. Rolfe also directed Rad Techs to take samples from trenches in such a way as to avoid hot rad areas.

### **Tina Rolfe**

Tina Rolfe was personally involved in soil sample switching fraud under the direction of her husband Steve. She also participated in chain of custody fraud and in the alteration of scanning data.

**Tina Robertson**

Robertson was a Rad Tech who had personal involvement in chain of custody falsification, soil sample switching and changing scanning data.

**Marie Snyder**

Snyder was a Rad Tech who was involved in RSY pad fraud including avoiding taking samples from towed array-designated hot spots in order to obtain RSY soil clearance. Directions she received from McWade and managers to avoid proper sampling at RSY pads. She also participated in improper scanning at the Portal Monitor in order to improperly release soil as clean and in destruction of failed portal monitor documents.

**Jane Taylor**

Jane Taylor was a Rad Tech who committed resume fraud and misrepresentation of her rad work experience in order to get her job at HPNS. Inquiry should be made into directions from McWade, Dougherty and others to obtain clearance for RSY pad soil and survey units regardless of the existing rad conditions. Inquiry should include her work with Thorpe Miller on RSY pad data for the taking of soil samples and how steps were taken to avoid hot spots. Taylor also directed laborers to take soil from non-RSY pad areas and use that soil for samples claimed to come from RSY pads. She also has personal knowledge of switching of soil samples.

**PERCIPIENT WITNESSES WHO HAVE NOT BEEN INTERVIEWED** (or were interviewed inadequately\*)

**Susan Andrews\***

Andrews was a Rad tech in the field, a lab worker and for a time was responsible for the portal monitor. Andrews was briefly interviewed by an NRC investigator but was not able to describe the full extent of her knowledge of the fraud. She was ordered to destroy scanning data that would have barred the free release of materials off Hunters Point or face termination. She was also required to manipulate the Portal Monitor in 2011 to permit soil loads, fraudulently processed on the RSY pads, off Hunters Point that may have contained radiation above release levels.

**Adam Berry**

Berry was a Rad Tech Supervisor and then RSOR after the dismissal of Bert Bowers. Inquiry should be made into his knowledge and direction to rad tech staff to obtain clearance of areas that still had high rad readings. He also has knowledge of Hubbard and Rolfe directing their teams to obtain false samples and scan readings and has knowledge of threats made by Justin Hubbard to rad techs and others to get them to go along the fraud.

**Elbert Bowers\***

RSO Representative at HPNS, and a Senior Rad Tech prior to HPNS for over a decade, Bowers has never been interviewed by Navy representatives. Although he was interviewed by NRC officials, but was not given an opportunity to disclose all he knew. Bowers has knowledge of multiple violations of Tetra Tech's license, including improper access to RCAs, inadequate warning sign postings and others. He also has knowledge about Jane Taylor's resume fraud and the improper hiring of Thorpe Miller and his wife, Karisa Miller, to co-opt Laurie Lowman. Bowers has knowledge of Christine Dougherty's central role in false reporting to the Navy and regulators. Bowers can describe how lab workers and managers could manipulate samples submitted for 3<sup>rd</sup> party review.

**Dee Butler**

Dee Butler was a Rad Tech with knowledge of false soil sampling processes at the direction of TT supervisors, including Hubbard, Rolfe, and she was one of the employees threatened by supervisors, including Hubbard when she raised questions about improper procedures.

**Joe Cunningham\***

Cunningham was a Rad Tech involved in false soil sampling directed by Hubbard, Rolfe, and Bill Dougherty. He was also threatened by McWade and Hubbard to prevent him and others from objecting to rad fraud.

**Chris Fluty**

Chris Fluty worked in rad lab at HPNS under Paul Wall. He has knowledge of lab receipt of false COC forms from the field. He also has knowledge of deletion of records of soil sample results with high readings and replacement with subsequent clean samples used to falsely obtain clearance. He also has knowledge of steps taken to assure that samples delivered to an outside lab would obtain results allowing for clearance.

**Robin Fluty**

Robin Fluty worked in the rad lab at HPNS under Paul Wall. She has knowledge of lab receipt of false COC forms from the field, of steps taken to delete records of soil samples resulting in readings in excess of the remediation standards and the replacement of those samples results with subsequent clean samples to falsely obtain clearance. He also has knowledge of pressure by TT management to cut corners to obtain regulatory clearance and of steps taken to assure samples delivered to an outside lab would obtain results allowing for clearance.

**Joshua Hooper**

Hooper was a Rad Tech who was involved in fraudulent soil sampling from the crawl space under building 351A. He and Anthony Smith were ordered by Bill Dougherty to dispose of soil samples that had been properly taken but whose results came back above release levels and were directed to take fraudulent soil samples from under building 351A by avoiding the areas determined to be hot from previous sampling. He can also testify about high level managers of

TT, RSRS, and IOEI being present when Dougherty ordered Smith and Hooper to destroy samples that came back too hot and substitute clean samples.

#### **Phil Poole**

Poole was a Rad Tech who has knowledge of pressure by TT management, including Dougherty and McWade, to falsify rad work. He can corroborate much of what Susan Andrews knows, including that McWade and Chuck Taylor of TT ordered her not to interfere with returning hot fence panels to their owner and actions by McWade and Taylor, to have rad records destroyed. He has knowledge of pressure by TT management to improperly clear truckloads of soil that may have contained rad material above release levels by changing the scan sensitivity of the Portal Monitor and through defective hand scanning.

#### **Samantha Taylor**

Samantha Taylor was a Rad Tech who has knowledge of her mother Jane Taylor's resume fraud and asked at least one other rad tech to lie about her mother's past work history. She also was involved in changing scanning data at the direction of TT supervisors and managers and in switching soil samples with high readings with samples taken from areas known to be below release levels.

#### **Paul Wall**

Wall was the on-site lab director. He has knowledge of pressure from TT management to improperly obtain lab results that would permit clearance of units at HPNS. He also was aware of procedures that blocked samples from 3<sup>rd</sup> party testing that TT employees knew would result in readings prohibiting unit clearance. He also has knowledge of Darryl DeLong's efforts to control which soil samples would be delivered to 3<sup>rd</sup> parties and knowledge of COC falsification.

#### **Donna Watson**

Watson was a Rad Tech who has personal knowledge of scanning data alteration by TT supervisors and managers, including witnessing Justin Hubbard's alteration of scan data. She can also testify about taking samples from one place and reporting them as having come from another, false COC documentation, false surveys of keel blocks, truckloads exiting HPNS without clearance through the Portal Monitor and the theft/scavenging of copper from HPNS at the direction of TT managers.

#### **Bryan White**

White was a Rad Tech Supervisor. He has personal knowledge of Jane Taylor's involvement in rad fraud, lack of qualifications, and that Taylor was allowed to violate SOPs due to her romantic relationship with McWade. White was also aware of defective RSY scanning and soil sampling by Jane Taylor and Marie Winder. White also knew about soil sampling fraud engaged in by the Hubbard and Rolfe work teams. White was aware of pressure from Dougherty and McWade to obtain fraudulent clearance.

#### **Marie Winder**

Winder was a Rad Tech who has personal knowledge of soil sampling fraud in the field and fraudulent RSY pad processing. Winder cooperated in rad fraud and submitted false

timecards as part of her reward for engaging in it. She also was involved in changing scan data and falsifying COC documents.

**Rick Zahensky**

Zahensky was a Rad Tech. He was involved in taking false soil samples and in soil swapping fraud. He was also involved in scanning fraud by scanning faster than permissible and by leaving the scanner running to generate results but not actually scanning at all. He was a central figure in altered scanning data so that it reported results that came within release levels.